

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHEVRON CORPORATION,	X
	:
Plaintiff,	:
	:
v.	:
	:
STEVEN DONZIGER, et al.,	:
	:
Defendants.	:
	X
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11 Civ. 0691 (LAK)

**DECLARATION OF ANNE CHAMPION IN SUPPORT OF CHEVRON  
CORPORATION'S MOTION TO HOLD STEVEN DONZIGER IN  
CONTEMPT OF COURT FOR HIS FAILURE TO COMPLY WITH  
THE COURT'S AUGUST 15 AND 21, 2018 ORDERS**

I, ANNE CHAMPION, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and before this Court. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, and I am counsel for Chevron Corporation ("Chevron") in the above-captioned matter. I am personally familiar with the facts set forth herein, unless the context indicates otherwise.

2. On September 4, 2018, Steven Donziger delivered to my office an executed and notarized version of the transfer document which was annexed to the Court's August 15, 2018 order as Exhibit 1. A true and correct copy of that document is attached as **Exhibit 1**. Donziger did not on September 4, 2018, or at any time since, deliver to my office a fully executed, acknowledged, and notarized original of Dkt. 2048-2 (the "Amazonia share transfer document").

3. On September 7, 9, and 10, 2018, I sent emails to Donziger inquiring about his failure to deliver to my office a fully executed, acknowledged, and notarized original of the Amazonia share transfer document. On September 9, 2018, Donziger stated via email to me that

he would “do this tomorrow and you can pick it up.” On September 10, 2018, Donziger stated via email to me that “Sorry the arbitral ruling and the holiday changed my sked. I am leaving early in the morning. I will have it by close of biz Thursday or latest Friday. Thanks.” A true and correct copy of this email chain is attached as **Exhibit 2**.

4. On September 13, 2018, Donziger stated via email to me “Can u please indicate your view of the legal basis for your request that I re-execute the Amazonia transfer form and have it notarized, when I already did that several weeks ago. Thanks, Steven.” I responded on September 14, 2018, stating “Dear Steven: The Court ordered you to execute and notarize the Amazonia share transfer document on August 15 (Dkt. 2072 at 9) and again on August 21 (Dkt. 2079 at 5), dates that have long passed. You are in contempt of the Court’s orders, and if we do not receive the signed, notarized document by 4 PM today, we will proceed to address this issue with the Court. Thank you.” Donziger responded on September 14, 2018, stating “It appears the Court was unaware I had already executed the order several weeks earlier when it issued the order you cite. Since the order had previously been complied with, I am not going to execute the same document again unless ordered by the Court. If your issue is with the addendum, I have given you a clean version of the transfer docuent per the court's order in May although to be clear I stand by the addendum from then and the more recent one I submitted with the other transfer form, as is my First Amendment right. Thanks.” I responded, also on September 14, 2018, stating “The share transfer form you executed in May reflected your “addendum” and was held by the court to be insufficient to comply with the Judgment. The Court was indeed aware of this as it was filed with the Court in May (Dkt. 2003-3, attached), and is quoted in the Court’s May 16 order (Dkt. 2006, attached). The share transfer form you executed in August—also attached—is not notarized. Accordingly, you have not complied with the Court’s order of August 15 (Dkt. 2072 at 9, attached), requiring you to “execute, acknowledge before a notary

public, and deliver to Chevron’s counsel of record in this case, on or before August 21, 2018,” the share transfer form (Dkt. 2048-2, attached) without “affix[ing] or add[ing] anything to either document.” Dkt. 2072 at 9. You have also not complied with the Court’s order of August 21, requiring you, “[n]o later than August 29, 2018,” to transmit a “fully executed, acknowledged, and notarized” version of the share transfer form to “Chevron’s lead counsel.” Dkt. 2079 at 5-6 (attached). I understand from your last email that you are refusing to provide a notarized version of the Amazonia share transfer as ordered, we will thus be seeking relief from the Court. If my understanding is not correct, please let me know now. Thanks.” A true and correct copy of this email chain is attached as **Exhibit 3**.

Executed on this 17th day of September, 2018 at New York, New York.

/s/ Anne Champion  
Anne Champion